



December 29, 2003

RCRA Compliance Evaluation Inspection Report

Date of Inspection: Tuesday, October 14, 2003

Facility/Company Inspected:
American Stock Exchange
EPA I.D. No. TBD

Facility/Company Mailing Address:
86 Trinity Place
New York, NY 10006

Inspection Location:
loading dock at Greenwich Street at Thames Street (back of building)

Facility representatives: Kenneth Blischke, Security Supervisor
Thomas (Tommy) Long, Facility Manager

EPA Inspectors: Steven Petrucelli, CHMM, Environmental Engineer
EPA Region 2, DECA-RCB-Special Waste Team

 12/29/03

Leonard Voo, CHMM, Senior Enforcement Specialist
EPA Region 2, DECA-RCB-Special Waste Team

A RCRA compliance evaluation inspection was conducted on Tuesday, October 14, 2003 at the request of the RCRA Branch Chief, Mr. George C. Meyer, PE. Earlier in the day, Mr. Meyer had noticed a number of old computers in a dumpster at the corner of Greenwich and Thames Streets during a lunchtime walk.

EPA inspectors arrived at the corner of Greenwich and Thames Streets at approximately 2:45pm. Since there was no dumpster visible that seemed to be at the location or meet the physical description given by Mr. Meyer, several construction workers nearby were asked about any dumpsters coming in or out that day. They said that a dumpster had been taken from behind the

American Stock Exchange (AMEX) a little while earlier. Accordingly, we knocked on the locked loading dock door at the back of the American Stock Exchange.

We were initially met by Mr. Kenneth Blischke, AMEX's Security Supervisor, who answered a few questions, then called Mr. Thomas (Tommy) Long, Facility Manager, who soon joined us. The following information is based on discussion with Mr. Blischke and Mr. Long; since the dumpsters had been removed, we could not confirm statements about the dumpsters contents. Mr. Long said that correspondence should be sent to him.

The shipment had been taken a few hours earlier by Filco Carting. The load included computers and office equipment being disposed of by AMEX from this location, 86 Trinity Street. The equipment had all been owned by AMEX and had been used on the trading floor. The dumpster had been filled the previous day. There were no monitors, as they pay a company called "DCI" to take them away separately. PCs had been placed in the dumpster intact, but AMEX staff believed that there had been a fair amount of scavenging of material overnight, particularly boards from the PCs.

All of the equipment was owned by AMEX, a subsidiary of NASD, but was probably maintained by a contractor. Specifically, an in-house contractor, Securities Industry Automation Corp. (SIAC), maintains much of AMEX's equipment. AMEX staff said that an internal process is in place to handle excess equipment properly, but that this shipment slipped by. They said that a copy of their written policy should be available by writing to Mr. Long.

At the close of the inspection, we told Mr. Long and Mr. Blischke that we would follow up with questions regarding their policy for electronics equipment disposal and specifically about this shipment. Within a few hours after completion of the inspection, Mr. Long left a voicemail message for Mr. Petrucelli indicating that they had Filco Carting stop the truck and hold the contents so they could evaluate and test the equipment before deciding where it would ultimately be sent.